

May 6, 2005

Bonnie Stone, Elections Analyst  
City of San Diego  
Office of the City Clerk/Elections  
202 C Street, MS 2A  
San Diego, CA 92101

**Re: Your Request for Advice  
Our File No. A-05-090**

Dear Ms. Stone:

This letter is in response to your request on behalf of the City of San Diego for advice regarding the campaign provisions of the Political Reform Act (the "Act").<sup>1</sup>

### **QUESTION**

May candidates and committees involved in a special election to be held on July 26, 2005, combine the second pre-election campaign statement with the first semi-annual statement due July 31, 2005?

### **CONCLUSION**

In connection with a July 26, 2005, special election, candidates and committees may use a filing schedule that combines the pre-election campaign statement with the semi-annual statement due on July 31, 2005.

### **ANALYSIS**

During an election, candidates and committees involved in the election are required to file two campaign statements disclosing contributions received and expenditures made in connection with that election. These pre-election campaign statements are generally filed 40 days before the election and again 12 days before the election. (Section 84200.8.) Semi-annual statements are filed January 31 and July 31, respectively. (Section 84200.)

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<sup>1</sup> Government Code sections 81000 – 91014. Commission regulations appear at Title 2, sections 18109-18997, of the California Code of Regulations.

There is a mechanism in the Act that permits the combining of statements when an overlapping reporting period occurs, or the filing of the semi-annual statement would be an additional, unnecessary filing to the two pre-election statements. (Section 84205.) In this case, filing the two pre-election statements in connection with a July 26, 2005, election will satisfy the semi-annual filing requirement.

A campaign statement filing schedule which outlines the due dates for filing statements in connection with the election is enclosed for your convenience.

If I may be of any further assistance, please do not hesitate to contact me at (866) 275-3772.

Sincerely,

Luisa Menchaca  
General Counsel

By: Teri Rindahl  
Political Reform Consultant  
Technical Assistance Division

Enclosure

TR: rd

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